

2 September 2019



Australian Energy Market Operator  
GPO Box 2008  
Melbourne VICTORIA 3001

[5ms@aemo.com.au](mailto:5ms@aemo.com.au)

Dear Sir/Madam

**Energy Queensland submission to Five Minute and Global Settlement – Metering Procedure Changes (Package 2) Draft Determination**

Energy Queensland welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on the Draft Determination for the second package of changes to metering procedures associated with the implementation of Five Minute and Global Settlements. This submission is provided by Energy Queensland, on behalf of its related entities Energex Limited (Energex), Ergon Energy Corporation Limited (Ergon Energy), Ergon Energy Queensland Limited (Ergon Energy Retail) and Yurika Pty Ltd (Yurika).

Energy Queensland's comments on the proposed changes to metrology documents are provided in the attached participant response template. Energy Queensland remains committed to contributing further to this discussion via AEMO's Five Minute Settlement working groups.

Should AEMO require additional information or wish to discuss any aspect of Energy Queensland's submission, please contact me on (07) 3851 6787 or Andrea Wold on (07) 3664 4970.

Yours sincerely

A handwritten signature in black ink that reads "Trudy Fraser".

Trudy Fraser  
**Manager - Policy and Regulatory Reform**

Telephone: (07) 3851 6787 / 0467 782 350

Email: [trudy.fraser@energyq.com.au](mailto:trudy.fraser@energyq.com.au)

*Enc: Energy Queensland comments on the changes to Metering Procedures*

# FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

## PROCEDURE CONSULTATION

## DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Energy Queensland

***Submission Date:*** 2 September 2019

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## 1. Context

This template is being provided to assist stakeholders in giving feedback about the changes specified in the ‘Five-Minute Settlement Metering Procedure Changes – Package 2’ Draft Procedures.

Please note, the change marked versions of the Draft Procedures highlights the changes required between the first stage Initial Draft Procedures and the second stage Draft Procedures.

The changes being proposed seek to enable the implementation of:

- The Five-Minute Settlement (5MS) Rule
- The Global Settlement (GS) Rule
- Changes to the delivery, format and content contained in the meter data files sent to AEMO.

## 2. Metrology Procedure: Part A

Section	Description	Participant Comments
3.1	Requirements under National Measurement Act and Use of Standards	Energy Queensland offers no comment on this change.
3.4	“x” values – Calculation and Use	Energy Queensland offers no comment on this change.
12.3, 12.7	Provisions for non-contestable unmetered loads	<p>Section 12.3 (b) – Energy Queensland seeks confirmation on why devices were not mentioned in this paragraph when Metrology Procedure: Part B section 13.1.2 (d) indicates a listing must be maintained. We suggest the wording be updated to: “... <i>And calculation methodologies, non-contestable unmetered load physical inventory tables and Agreed Loads</i>”.</p> <p>Section 12.7(c) – Energy Queensland does not agree with the changes proposed to section 12.7(c) given the calculation methodology will be applied from the inventory table. Energy Queensland suggests the wording be updated to “<i>Where there is a discrepancy between the</i>”.</p>

Section	Description	Participant Comments
		<i>Inventory Table held in the metering data services database for a non-contestable unmetered load and the Physical Inventory, the Physical Inventory is to be taken as prima facie evidence of the actual number of Unmetered Devices."</i>

### 3. Metrology Procedure: Part B

Section	Description	Participant Comments
6.1 (d) <sup>1</sup>	Substitution rules for non-contestable unmetered loads	Energy Queensland is of the view that section 6.1(d) does not cater for where additional devices are added to an existing National Meter Identifier (NMI) (one NMI for multiple device scenario). We suggest that the wording be updated to include the concept of Physical Inventory / Device Inventory updates.
11.5	Accumulation Meter Profiler – Net System Load Profile	Ergon Energy Retail remains of the view that the Net System Load Profile (NSLP) methodology has not been revisited since the market commenced. In our view the NSLP should be calculated at the Transmission Node Identifier rather than distributor jurisdiction.
12.3	Profile Area five-minute load profile calculation	Energy Queensland offers no comment on this change.
12.4	Applying the five-minute profile to 15-minute and 30-minute metering data for a Profile Area	Energy Queensland offers no comment on this change.

<sup>1</sup> Note: Comments in red relate to new rows inserted in the template by Energy Queensland.

Section	Description	Participant Comments
13	Non-contestable unmetered loads	<p>Section 13.1.2(c) - Energy Queensland is of the view that this section does not adequately reflect the requirement to keep the physical inventory/device listing up to date. Energy Queensland suggests that the wording be updated to include the concept of keeping the non-contestable device inventory listing current as well as the calculation methodology and agreed load. The term non-contestable device inventory should be added to the Glossary and Framework document.</p> <p>Section 13.1.2(d) - Energy Queensland indicates that this section currently suggests every device is controlled. We suggest that the wording be updated to remove the "<i>at least</i>" part of the first sentence and insert "<i>where applicable</i>" into this sentence, allowing for uncontrolled non-contestable unmetered loads.</p> <p>Section 13.1.2(e) - Energy Queensland is of the view that section 13.1.2(e) does not adequately reflect the requirement to provide to participants the physical inventory/device counts that are stored and used in calculations. We suggest that the wording be updated to include the requirement to have the device counts available for each device when requested.</p> <p>Section 13.1.3 – Energy Queensland is of the view that the definitions are no longer clear as it appears some items are transitional, yet others are end state post rule change. Energy Queensland suggest wording changes to capture end state only.</p> <p>Section 13.3.1 (c) - Energy Queensland is of the view that section 13.3.1 (c) contradicts the introductory statement in section 13.3 which indicates that AEMO will determine the annual consumption. Energy Queensland suggests the wording be updated to accommodate the Metering Coordinator providing the calculation methodology as agreed (albeit approved by AEMO).</p>
Various	Inclusion of the word "affected"	Energy Queensland offers no comment on this change.

#### 4. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
3.2.15, 3.2.17	Unaccounted for energy (UFE)	Energy Queensland offers no comment on this change.
5.2	MDP Obligations	Energy Queensland offers no comment on this change.
6	Load Data – Interval NMI Datastream	Energy Queensland offers no comment on this change.
9.11- 9.14	MDM RM Reports	Energy Queensland does not agree that the NMI or Sequence Number should be mandatory for RM38 – DataStream Missing Data Report or RM39 – Mismatch Data Report. We suggest that the wording be updated from " <i>must</i> " to " <i>may</i> ".

#### 5. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
2.3	Local Network Service Provider	Section 2.3 (b) - Energy Queensland seeks confirmation why POOLXXX is discussed in this paragraph when it does not apply to LARGE, SMALL or NCONUML NMIs. This is covered in the MSATS Procedure: WIGS document.
Various	Reference to NMI Procedures Appendix E	Energy Queensland offers no comment on this change.
4.4	Use of LR/ENLR within this Procedure	Energy Queensland notes in section 4.4 an additional " <i>is</i> " has been left in the second sentence which requires removal.
4.10	NMI Classification Codes	Energy Queensland offers no comment on this change.

4.12.2	Datastream Status Codes	Section 4.12.2 (b) - Energy Queensland notes that in section 4.12.2 (b) Data Stream has been misspelt. We note that the "of" in section 4.12.2 (b) has also been misspelt.
4.13.1	Consequences of Allocating Certain Metering Installation Codes	Section 4.13 - Energy Queensland seeks confirmation as to why the Manually Read Flag on Metering Installation Type code NCONUML is indicated as N/A.
4.17	Maintenance of Codes and Rules	Energy Queensland suggest that the " <i>Maintenance of Codes and Rules</i> " line should be displayed as a heading as per Metering Package 2 - Stage 1 consultation.
5	MSATS REPORTS	Energy Queensland offers no comment on this change.
Various	References to LR and ENLR	Energy Queensland offers no comment on this change.
11, 13, 15, 16, 17, 20, 21, 22, 23, 24, 25, 26, 27, 30, 31, 32, 39, 40	Inclusion of NCONUML	Section 39 - Energy Queensland seeks confirmation as to why certain change request (CR) transactions have been excluded for NCONUML e.g. CR68XX MDP (calculation methodology) role change.
Various	Updated table references	Energy Queensland offers no comment on this change.

## 6. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
1.4	WIGS Codes and Rules for a Change Request	Energy Queensland offers no comment on this change.



Various	Inclusion of “NREG” NMI Classification Code	Energy Queensland offers no comment on this change.
Various	Inclusion of “BULK” NMI Classification Code	Energy Queensland offers no comment on this change.
Various	Inclusion of “XBOUNDRY” NMI Classification Code	Energy Queensland offers no comment on this change.
Various	Inclusion of “DWHOLSAL” NMI Classification Code	Section 3.2 (b) - From analysis of the MSATS Procedure: NMI, Energy Queensland is of the view that CR108X transfers should allow for the NMI classification of DWHOLSAL to be included.  Section 4.2 (c) – From analysis of the MSATS Procedure: NMI, Energy Queensland is of the view that CR1500 should allow for the NMI classification of DWHOLSAL to be included.
Various	Provisions for embedded network local retailers (ENLR)	Energy Queensland offers no comment on this change.
Various	Removal of Local Retailer (LR) references	Energy Queensland offers no comment on this change.
6.7	CR 202X transactions	Section 6.7 – Energy Queensland notes that WHOLESAL is not currently included in the available NMI classifications for objections of CR202X transactions (section 6.7). Energy Queensland suggest that WHOLESAL be added into the NMI classification list given it is included in section 6.2 (b) as an available NMI classification code.
23.6	CR 642X transactions	Section 23.6 – Energy Queensland note that WHOLESAL has not been included in the NMI classification list for Objections even though it is allowed on the CR as per section 23.2 (b).
25.2	CR 670X transactions	Energy Queensland queries why four NMI classifications (NREG, BULK, XBOUNDRY and DWHOLSAL) have been removed from the list of NMI Classification Codes under which it is possible to change MPB. We question why there is a restriction on changing MPB (Metering Provider

		– Category B) for these metering types? We suggest including these NMI classifications back into the CR670X transactions.
General	Document overview	Energy Queensland notes there is nothing in this document which explicitly indicates what NMI classification codes this Procedure relates to. We suggest the inclusion of something similar to that stipulated in MSATS Procedure: CATS document section 4.10 NMI Classification Codes.

## 7. National Metering Identifier

Section	Description	Participant Comments
VRH	Effective date updated to 1 July 2021	Energy Queensland offers no comment on this change.
Appendix E	Inclusion of appendix to better communicate NMI Classification and Role requirements	Energy Queensland's comments are included in A.19 & A.20 below.
2.4	Allocation of NMIs for non-contestable unmetered loads	Section 2.4(c) - Energy Queensland is of the view that sections 2.4 (c) and 2.4 (b) are inconsistent and recommend either the removal of 2.4 (c) or the wording to include the clarification 'unless NMIs relate to a single device'.
6	Changes to DATASTREAM SUFFIX	Energy Queensland offers no comment on this change.
A.19, A.20	Non Contestable Unmetered Load – One NMI With Multiple Devices	<ul style="list-style-type: none"> <li>Appendix E - Energy Queensland is of the view that in Table 5 for Contestable Unmetered Loads the FRMP should be RetailerID% rather than LR% as per the diagram.</li> <li>In Table 5, the off market child of a Registered Generator and Spot Market Customer in the Transmission Network with an LNSP = ENM% (2), Energy Queensland seeks confirmation whether the FRMP = ParentFRMPID% (per Table 5) or GenPartID%/CustID% (per the diagram).</li> </ul>

		<ul style="list-style-type: none"> <li>• In Table 5, the Registered and Unregistered off market child of a Generator in the Distribution Network with an LNSP = ENM% (4), Energy Queensland seeks confirmation whether the FRMP = ParentFRMPID% (per Table 5) or GenPartID%/PartID% (per the diagram)</li> <li>• In Table 5, the Generation and Load child of a Generator in the Distribution Network with an LNSP = ENM% (3), Energy Queensland seeks confirmation whether the FRMP = RetailerID% (per Table 5) or CustID% (per the diagram).</li> <li>• In Table 5, the Generation and Load child of a Generator in the Distribution Network with an LNSP = ENM% (4), Energy Queensland seeks confirmation whether the FRMP = ParentFRMPID% (per Table 5) or GenPartID%/CustID% (per the diagram).</li> <li>• In the On Market Customer in the Embedded Network Manager (ENM) in the Distribution Network with an LNSP = ENM% (4), the NMI should have a NMI Class = LARGE/SMALL/DWHOLSAL as per Table 5 – Customer\Embedded Network (within Distribution Network)\On market child\Retail customer.</li> <li>• Energy Queensland suggests that the Transmission to Transmission scenarios for NMI classification INTERCONN as well as the Sample scenario for NMI classification SAMPLE be added to both Appendix E diagrams for completeness.</li> </ul>
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## 8. NEM RoLR Processes – Part A

Section	Description	Participant Comments
Various	Removal of first and/or second tier references	Energy Queensland offers no comment on this change.

Various	Provisions for ENLR	Energy Queensland offers no comment on this change.
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## 9. Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
2.4	Specific obligations for MDP - Category D	Energy Queensland offers no comment on this change.
3.7	Metering Data Processing Requirements	Energy Queensland offers no comment on this change.
3.10.2	Non-contestable Unmetered Load Calculation Methodologies and Agreed Loads	Section 3.10.2 (b) - Energy Queensland suggest that section 3.10.2 be reworded to include the concept of the Physical/Device Inventory being updated with any changes.
3.12.4	Delivery of Settlements Ready Data	Energy Queensland offers no comment on this change.
3.12.5	Method of Delivery of Data	Energy Queensland offers no comment on this change.
5	METER CHURN DATA MANAGEMENT	Energy Queensland offers no comment on this change.

## 10. Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
1.1	Purpose and scope	Energy Queensland offers no comment on this change.
1.2	Definitions and interpretation	Energy Queensland offers no comment on this change.
2	APPLICATION PROCESS	Energy Queensland offers no comment on this change.

## 11. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
2.7.7	Exemptions	Energy Queensland offers no comment on this change.
5	GLOSSARY	Energy Queensland offers no comment on this change.